UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

Comes now Diana S. Daugherty, Standing Chapter 13 Trustee, and states as follows:

- 1. The first amended plan is not feasible in that:
- a) It will pay priority claims in full.
- b) The base of the first amended plan is approximately \$135 short of being feasible.

WHEREFORE, the Trustee prays that the Court deny confirmation of Debtor's First Amended Chapter 13 Plan; and for such other relief as this Honorable Court deems necessary and just under the circumstances.

Respectfully Submitted,

/s/ Joseph M. Wilson
Diana S. Daugherty
Chapter 13 Trustee
Joseph M. Wilson
FED#51849MO; MO#51849
Attorney For Trustee
P.O. Box 430908
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(314) 781-8100
(314) 781-8881 (fax)
E-Mail: trust33@ch13stl.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above Trustee's Objection was filed electronically with the United States Bankruptcy Court on the $\underline{29th}$ day of September, 2021, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

The undersigned hereby certifies that the above Trustee's Objection was filed electronically with the United States Bankruptcy Court and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below, on the <u>29th</u> day of September, 2021:

Eric Dancy 846 Fontaine Place St. Louis, MO 63137

/s/ Joseph M. Wilson